

United States District Court
for the
Southern District of New York
Related Case Statement

Full Caption of Later Filed Case:

See Annexed Caption Page.

Plaintiff	Case Number
vs.	1:22-mc-00036
Defendant	

Full Caption of Earlier Filed Case:

(including in bankruptcy appeals the relevant adversary proceeding)

See Annexed Caption Page.

Plaintiff	Case Number
vs.	1:21-mc-00376-JGK-SN
Defendant	

Status of Earlier Filed Case:

☐

Closed

(If so, set forth the procedure which resulted in closure, e.g., voluntary dismissal, settlement, court decision. Also, state whether there is an appeal pending.)

☒

Open

(If so, set forth procedural status and summarize any court rulings.)

Magistrate Judge Sarah Netburn denied Ukraine's motion to quash. Ukraine's objections were dismissed by District Judge John G. Koeltl. These orders are on appeal to the Second Circuit in Case No. 21-02979. A motion for entry of a protective order remains pending before Magistrate Judge Netburn. With regard to the recourse from the underlying D.C. district court judgment, Ukraine met and conferred with Tatneft and will be filing a motion to stay mandate with the D.C. Circuit shortly, followed by a petition for a writ of certiorari thereafter.

Explain in detail the reasons for your position that the newly filed case is related to the earlier filed case.

This case and the earlier-filed case both involve subpoenas issued by Tatneft to third parties allegedly to aid in execution of the judgment of the D.C. District Court in Case No. 17-cv-00582.

Signature: s/Maria Kostytska

Date: 02/08/2022

Winston & Strawn LLP

Firm: _____

RELATED CASE STATEMENT (CONT.)

FULL CAPTION OF LATER FILED CASE:

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

IN RE SUBPOENAS SERVED ON

JSC STATE EXPORT-IMPORT BANK OF UKRAINE; BANK
POLSKA KASA OPIEKI SA; DEUTSCHE BUNDESBANK;
RESERVE BANK OF AUSTRALIA; AB SEB BANKAS; SEB
SECURITIES, INC.; BANK OF MONTREAL; BMO FINANCIAL
CORP.; BMO CAPITAL MARKETS CORP.; THE BANK OF NEW
YORK MELLON CORPORATION; BARCLAYS BANK PLC;
BARCLAYS CAPITAL INC.; BNP PARIBAS FORTIS SA/NV; BNP
PARIBAS USA, INC.; BNP PARIBAS; CITIBANK N.A.;
CITIGROUP INC.; CITIGROUP GLOBAL MARKETS LTD.;
COMMERZBANK AG; COMMERZ MARKETS LLC; CREDIT
SUISSE (SWITZERLAND) LTD.; CREDIT SUISSE AG; CREDIT
SUISSE (USA), INC.; DANSKE BANK A/S; DANSKE MARKETS
INC.; DEUTSCHE BANK TRUST COMPANY AMERICAS;
DEUTSCHE BANK TRUST CORPORATION; DEUTSCHE BANK
AG; DNB BANK ASA; DNB CAPITAL LLC; DNB MARKETS, INC.;
HSBC BANK PLC; HSBC NORTH AMERICA HOLDINGS INC.;
JPMORGAN CHASE BANK N.A.; JPMORGAN CHASE & CO.; J.P.
MORGAN SECURITIES PLC; J.P. MORGAN SECURITIES LLC;
MUFG BANK, LTD.; MUFG AMERICAS HOLDING
CORPORATION; MUFG SECURITIES AMERICAS INC.;
RAIFFEISEN BANK INTERNATIONAL, AG; RB
INTERNATIONAL MARKETS (USA) LLC; SANTANDER BANK
POLSKA S.A.; STANDARD CHARTERED BANK PLC;
STANDARD CHARTERED BANK (HONG KONG) LTD.;
STANDARD CHARTERED SECURITIES (NORTH AMERICA)
LLC; UBS SWITZERLAND AG; UBS AMERICAS INC.; UBS AG;
UBS AMERICAS HOLDINGS LLC; UNICREDIT BANK AG; AND
UNICREDIT CAPITAL MARKETS LLC:

UKRAINE,

Petitioner,

-against-

PAO TATNEFT,

Respondent.

Misc. Case No. 1:22-mc-00036

(Arising from Case No. 1:17-cv-00582-
CKK in the United States District Court
for the District of Columbia)

FULL CAPTION OF EARLIER-FILED CASE:

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

IN RE SUBPOENAS SERVED ON LLOYDS BANKING GROUP PLC; LLOYDS AMERICA SECURITIES CORPORATION; LLOYDS BANK CORPORATE MARKETS PLC; THE CANADIAN IMPERIAL BANK OF COMMERCE; CIBC BANK U.S.A.; BANK OF AMERICA CORPORATION; BANK OF AMERICA, N.A.; WELLS FARGO & COMPANY; WELLS FARGO BANK, N.A.; THE GOLDMAN SACHS GROUP, INC.; GOLDMAN SACHS & CO. LLC; GOLDMAN SACHS INTERNATIONAL; MORGAN STANLEY; MORGAN STANLEY & CO. LLC; MORGAN STANLEY & CO. INTERNATIONAL PLC; MIZUHO BANK, LTD.; MIZUHO AMERICAS LLC; MIZUHO SECURITIES USA LLC; CRÉDIT AGRICOLE CIB; CREDIT AGRICOLE SECURITIES (USA) INC.; CREDIT AGRICOLE AMERICA SERVICES, INC.; SOCIÉTÉ GÉNÉRALE S.A.; SG AMERICAS SECURITIES, LLC; BANCO SANTANDER, S.A.; AND SANTANDER HOLDINGS USA, INC.:

UKRAINE,

Petitioner,

-against-

PAO TATNEFT,

Respondent.

Misc. Case No. 1:21-mc-00376-JGK-SN

(Arising from Case No. 1:17-cv-00582-CKK in the United States District Court for the District of Columbia, pending on appeal in Case No. 20-7091 in the United States Court of Appeals for the District of Columbia Circuit)